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June 30, 2022

VIA ECF

The Honorable Victor Marrero
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *United States v. Pedro Mejia*
22 Cr. 144 (VM)**

Dear Judge Marrero:

Please recall that I represent Mr. Pedro Mejia in his defense of the above-referenced matter. I write to request a change in Mr. Mejia's current bond conditions to remove the condition of home detention and impose a curfew to be determined by United States Pretrial Services.

On December 8, 2021, Magistrate Judge James L. Cott ordered Mr. Mejia's release on a \$100,000 personal recognizance bond co-signed by three suretors. Pursuant to the conditions of the bond, Mr. Mejia is presently subject to the condition of home detention except for employment purposes and other pre-approved activities, and his travel is restricted to the Southern and Eastern Districts of New York. He surrendered all travel documents and has not made and will not make any applications for new travel documents.

On June 28, 2022, I was contacted by United States Pretrial Services ("Pretrial") Officer Ashley Cosme indicating that Pretrial was recommending that Mr. Mejia request a modification of his bond conditions to remove the condition of home detention and impose a condition of a curfew to be determined by Pretrial. Officer Cosme made this recommendation based on Mr. Mejia's complete compliance with his bail conditions to date. We consulted with A.U.S.A. Thomas Burnett regarding the proposed modification, and the Government defers to Pretrial.

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Therefore, I respectfully request that Your Honor modify Mr. Mejia's bond conditions to remove the condition of home detention and impose a condition of a curfew to be determined by United States Pretrial Services. Thank you for your consideration of this request.

Respectfully submitted,



Mark I. Cohen, Esq.

MIC/gmf

Cc: A.U.S.A. Thomas Burnett (via ECF)
U.S.P.T.S.O. Ashley Cosme (via ECF)
Mr. Pedro Mejia (via email)

Request GRANTED.

The conditions of defendant Pedro Mejia's bond are hereby modified to remove the condition of home detention. A condition of curfew to be determined and monitored by Pretrial Services is imposed.

SO ORDERED.

7/1/2022

DATE



VICTOR MARRERO, U.S.D.J.